

1 HOLLY E. CHEONG, ESQ.
2 Nevada Bar No. 11936
3 TROUTMAN PEPPER LOCKE LLP
4 8985 S. Eastern Ave., Ste 200
5 Las Vegas, NV 89123 (Nevada Office)
6 Tele: (213) 928-9839
7 Holly.cheong@troutman.com

5 TROUTMAN PEPPER LOCKE LLP
350 South Grand Avenue, Suite 3400
6 Los Angeles, CA 90071 (Los Angeles Office)

7 Attorneys for Defendant Nationstar Mortgage LLC
8 d/b/a Rushmore Servicing (*erroneously sued as Rushmore*
Servicing LLC doing business for Nationstar Mortgage LLC)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

OLIVER COMPLOT.

Plaintiff.

V.

RUSHMORE SERVICING LLC DOING
BUSINESS AS NATIONSTAR MORTGAGE
LLC, a foreign limited liability company

Defendant.

Case No. 2:24-cv-01918-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Oliver Complot (“Complot”) and Defendant Nationstar Mortgage LLC dba Rushmore Servicing (*erroneously sued as Rushmore Servicing LLC doing business for Nationstar Mortgage LLC*) (“Nationstar”) that the above-referenced parties stipulate as follows:

1. On September 23, 2024, Plaintiff filed its claim in the Eighth Judicial District Court in Clark County, Nevada.
 2. On October 15, 2024, Plaintiff filed its Notice of Removal [DOC NO. 1].

111

3. On November 12, 2025, Plaintiff filed its First Amended Complaint and filed its Second Amended Complaint on December 17, 2024 [DOC. NO. 10].
 4. Nationstar filed its Motion to Dismiss Plaintiff's Second Amended Complaint on January 7, 2025 [DOC. NO. 28].
 5. On December 20, 2023, the Court entered a Discovery Plan and Scheduling Order [DOC. NO. 21] and an Order Scheduling Settlement Conference [DOC. NO. 23] for March 26, 2025.
 6. Due to scheduling of the parties and mediator the settlement conference was set for April 30, 2025.
 7. On April 6, 2025, Plaintiff requested the court to reschedule the settlement conference to accommodate his work schedule and the settlement conference has been rescheduled to June 20, 2025

Based on the parties' stipulation regarding rescheduling the settlement conference to June 20, 2025, past the close of discovery of June 1, 2025, the parties hereby jointly submit a proposed schedule to extend discovery and dispositive motions deadlines an additional 90 days. This is the parties' first request for an extension.

The parties' specific stipulations are as follows:

1. The deadline for Discovery Cut-Off to be extended from **June 1, 2025**, to **September 2, 2025**.
 2. The deadline for Rebuttal Expert Disclosures to be extended from **May 2, 2025**, to **July 31, 2025**.
 3. The deadline for filing Dispositive Motions is 30 days after Discovery Cut-Off date, Therefore, the deadline for filing Dispositive Motions to be extended from **July 1, 2025**, to **September 29, 2025**.
 4. The deadline for the Joint Pretrial Order, Fed. R. Civ. P. 26(a)(3) Disclosures, and any Objections to them to be extended from **July 31, 2025**, to **October 29, 2025**.

111

11

111

1 This stipulation is for good cause to accommodate an upcoming judicial settlement conference and
 2 will not result in delay of discovery, trial, or any hearing in this case.

3 **IT IS SO STIPULATED.**

<p>DATED this 11 day of April, 2025</p> <p>OLIVER COMPLOT</p> <p><u>/s/ Oliver Complot</u> Oliver Complot P.O. Box 1704 Buckeye, Arizona, 85326</p> <p><i>Pro Se Plaintiff</i></p>	<p>DATED this 11 day of April, 2025</p> <p>TROUTMAN PEPPER LOCKE LLP</p> <p><u>/s/ Holly E. Cheong</u> Holly E. Cheong, Esq. Nevada Bar No. 11936 8985 S. Eastern Ave., Ste. 200, Las Vegas, NV 89123 (<i>Nevada Office</i>)</p> <p><i>Attorneys for Defendant Nationstar Mortgage LLC d/b/a Rushmore Servicing (erroneously sued as Rushmore Servicing LLC doing business for Nationstar Mortgage LLC)</i></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

14 **ORDER**

15 Based upon the foregoing Stipulation by and between the Stipulating Parties, and good cause
 16 appearing, the proposed deadlines are approved as follows:

- 17 1. The deadline for Discovery Cut-Off to be extended from **June 1, 2025**, to **September 2,**
 18 **2025.**
- 19 2. The deadline for Rebuttal Expert Disclosures to be extended from **May 2, 2025**, to **July**
 20 **31, 2025.**
- 21 3. The deadline for filing Dispositive Motions is 30 days after Discovery Cut-Off date,
 22 Therefore, the deadline for filing Dispositive Motions to be extended from **July 1, 2025**,
 23 to **September 29, 2025.**
- 24 4. The deadline for the Joint Pretrial Order, Fed. R. Civ. P. 26(a)(3) Disclosures, and any
 25 Objections to them to be extended from **July 31, 2025**, to **October 29, 2025.**

26 **IT IS SO ORDERED.**

27 
 MAGISTRATE, UNITED STATES DISTRICT COURT
 DATED: April 14, 2025

Respectfully submitted by:

TROUTMAN PEPPER LOCKE LLP

/s Holly E. Cheong

Holly E. Cheong, Esq.

Nevada Bar No. 11936

8985 S. Eastern Ave., Ste. 200,

Las Vegas, NV 89123 (*Nevada Office*)

Attorneys for Defendant Nationstar Mortgage LLC
d/b/a Rushmore Servicing (*erroneously sued as Rushmore
Servicing LLC doing business for Nationstar Mortgage LLC*)